

REMARKS

This paper is filed in response to the Office Action mailed on July 7, 2006. Claims 1-18 are pending in the application. Of these, Claims 15-18 are withdrawn from consideration. Claims 1-14 have been examined and stand rejected. Reconsideration of Claims 1-14 is respectfully requested.

The Rejection of Claims 7-14 Under 35 U.S.C. § 112, Second Paragraph

Claims 7-14 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that applicants regard as the invention.

Claim 7 has been amended. Accordingly, the withdrawal of the rejection is respectfully requested.

The Rejection of Claims 1-14 Under 35 U.S.C. § 102(e)

Claims 1-14 are rejected under 35 U.S.C. § 102(e) as being anticipated by Dezutter et al. (U.S. Patent No. 6,811,879). Applicants respectfully traverse the rejection.

Claim 1 recites the steps:

introducing dewatered pulp to a rotating shaftless screw conveyor;

depositing said dewatered pulp from said shaftless screw conveyor to a moving belt conveyor, thereby forming uneven quantities of pulp along a length of belt conveyor;

leveling the uneven quantities of pulp to produce a substantially even quantity of pulp along a length of the belt conveyor; and

feeding a substantially even quantity of pulp per unit time from the belt conveyor to a pulp flaker to reduce the size of pulp into pulp flakes.

Claim 7, as amended, recites the steps:

conveying and mixing dewatered pulp resulting in an uneven mass flow of pulp;

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leveling the uneven mass flow of pulp to produce a substantially even rate of mass flow of pulp; and

thereafter, depositing the pulp in a substantially even rate of mass flow into a pulp flaker to produce pulp fibers, wherein the pulp flaker has two rotors rotating at a speed differential.

For a reference to be anticipatory, the reference must exactly describe the claimed invention. "Every element and limitation of the claimed invention must be found in a single prior art reference, *arranged as in the claim.*" *Brown v. 3M*, 60 U.S.P.Q.2d 1375, 1376 (Fed. Cir. 2001). "One seeking to invalidate a patent may not demonstrate invalidity of a claim simply by citing isolated steps in prior art that are not combined in the same fashion as in the patent." *Chemical Separation Technology, Inc. v. United States*, 63 U.S.P.Q.2d 1114, 1115 (Fed. Cl. 2002); *See also, Crowell v. Baker Oil Tools, Inc.*, 68 U.S.P.Q. 385 (9th Cir. 1946) ("It is not enough that one finds in prior art similar steps here and there, since inventive genius consists in picking out and combining all steps or inventing new ones in a new combination.").

The rejection, therefore, is not proper because the steps from the prior art it cites that purportedly anticipate the claims are either not arranged as in the claims or do not contain all the limitations when each step is considered individually.

In rejecting the claims, the Office Action states that "Dezutter discloses process wherein pulp is blended with adjuvants, flaked and finally dried as shown in Figure 1." Applicants understand this to mean steps 104, 102 (adjuvants, blend) 110 (flake) and 112 (dry) of FIGURE 1. However, Dezutter teaches that "from the dewatering unit, block 106, the pulp enters a first flaking unit depicted as block 110. The first flaking apparatus breaks up the dewatered pulp bundles into semi-uniform flakes" (See Col. 5, lines 16-19.) However, Claim 1 recites "introducing dewatered pulp to a rotating shaftless screw conveyor." Accordingly, the first flaking unit described by Dezutter is not a rotating shaftless screw conveyor. Presumably, the Examiner relies on the Vrbanac et al. patent (U.S. Patent

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No. 6,769,199) for teaching the introduction of dewatered pulp to a rotating shaftless screw conveyor, followed by a de-flaker. Vrbanac teaches a second dewatering block 50 followed by the shaftless screw conveyor, line 44, followed by a material handling fan 56, which may be a de-flaking device. (See Col. 5, lines 9-15; Col. 7, line 42 to Col. 8, line 2.)

After introducing dewatered pulp to a rotating shaftless screw conveyor, Claim 1 proceeds by reciting "depositing said dewatered pulp from said shaftless screw conveyor to a moving belt conveyor, thereby forming uneven quantities of pulp along a length of belt conveyor." The Examiner relies on Vrbanac for teaching a belt conveyor. However, to the extent that Vrbanac teaches a belt conveyor 110, Vrbanac uses the belt conveyor for separating fines from dried pulp flakes (fibers) at the exit of the jet drier 20. (See Col. 9, lines 51-58.) Vrbanac does not teach or suggest depositing the dewatered pulp from the shaftless screw conveyor 44 to a moving belt conveyor. On the contrary, Vrbanac teaches that from the shaftless screw conveyor 44, the dewatered pulp is fed to an airlock 60. Vrbanac describes the airlock 60 as a pulp feed device. (Col. 8, lines 21-27.) In another embodiment Vrbanac describes the material handling fan 56, which may be a de-flaking device, can be placed before the airlock 60. (Figure 2.) In any event, Vrbanac never teaches or suggests a belt conveyor after the shaftless screw conveyor 44.

After depositing dewatered pulp to a moving belt conveyor forming uneven quantities of pulp along a length of belt conveyor, Claim 1 proceeds by reciting "leveling the uneven quantities of pulp to produce a substantially even quantity of pulp along a length of the belt conveyor." The vacuum belt conveyor 110 of Vrbanac is a fiber separation station that is provided *after* the pulp exits the jet dryer 20 for separating the pulp fibers from the fines. (Col. 9, lines 51-63.) The Examiner has not shown how or why Vrbanac teaches or suggests the belt conveyor 110 levels uneven quantities of dewatered pulp to produce substantially even

quantities of pulp. Furthermore, the belt conveyor 110 is several steps removed from the shaftless screw conveyor 44.

Additionally, the present specification describes producing even quantities of pulp to the jet dryer is beneficial. (See p. 5, lines 11-13.) Therefore, Claims 1 and 7 describe alternatives to the airlock described in Vrbanac.

Accordingly, while Dezutter may generally teach dewatering followed by flaking and drying pulp, Dezutter does not teach or suggest the following steps, as arranged in Claim 1, or even when each step is taken individually:

- 1). introducing dewatered pulp to a rotating shaftless screw conveyor;
- 2). depositing said dewatered pulp from said shaftless screw conveyor to a moving belt conveyor, thereby forming uneven quantities of pulp along a length of belt conveyor;
- 3). leveling the uneven quantities of pulp to produce a substantially even quantity of pulp along a length of the belt conveyor; and
- 4). feeding a substantially even quantity of pulp per unit time from the belt conveyor to a pulp flaker to reduce the size of pulp into pulp flakes.

While Vrbanac may describe dewatering pulp followed by transporting to a shaftless screw conveyor and to a rotary airlock, Vrbanac does not teach or suggest the following steps, as arranged in Claim 1, or even when each step is taken individually:

- 1). depositing said dewatered pulp from said shaftless screw conveyor to a moving belt conveyor, thereby forming uneven quantities of pulp along a length of the belt conveyor;
- 2). leveling the uneven quantities of pulp to produce a substantially even quantity of pulp along a length of the belt conveyor; and
- 3). feeding a substantially even quantity of pulp per unit time from the belt conveyor to a pulp flaker to reduce the size of pulp into pulp flakes.

While Dezutter may generally teach dewatering followed by flaking and drying pulp, Dezutter does not teach or suggest the following steps, as arranged in Claim 7, or even when each step is taken individually:

- 1). leveling the uneven mass flow of pulp to produce a substantially even rate of mass flow of pulp; and
- 2). thereafter, depositing the pulp in a substantially even rate of mass flow into a pulp flaker to produce pulp fibers, wherein the pulp flaker has two rotors rotating at a speed differential.

While Vrbanac may describe dewatering pulp followed by transporting to a shaftless screw conveyor and to a rotary airlock, Vrbanac does not teach or suggest the following steps, as arranged in Claim 7, or even when each step is taken individually:

- 1). leveling the uneven mass flow of pulp to produce a substantially even rate of mass flow of pulp; and
- 2). thereafter, depositing the pulp in a substantially even rate of mass flow into a pulp flaker to produce pulp fibers, wherein the pulp flaker has two rotors rotating at a speed differential.

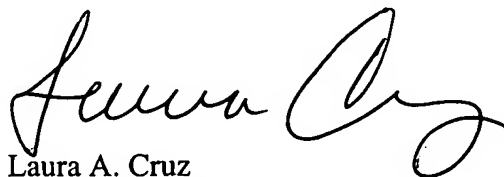
For the foregoing reasons, applicants submit that Dezutter, either alone or in combination with Vrbanac, does not teach or suggest either of Claims 1 or 7. Claims 2-6 and 8-14 are dependent from either one of Claims 1 or 7. Accordingly, the withdrawal of the rejection of Claims 1-14 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, applicants submit that Claims 1-14 are allowable. If the Examiner has any further questions or comments, the Examiner may contact the applicants' attorney at the number provided below.

Respectfully submitted,

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